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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRENDA QUALLS,

Plaintiff,

vs.

KILOLO KIJAKAZI, Acting Commissioner
of Social Security,

Defendant.

Civil No. 2:23-cv-01071-BNW

UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE ANSWERING BRIEF (*FIRST
REQUEST*)

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the
“Commissioner”), by and through her undersigned attorneys, hereby moves for a 49-day
extension of time to file her response to Plaintiff’s opening brief. The answering brief is due to
be filed by December 8, 2023. This is the Commissioner’s first request for an extension of time
to file the response.

1 Defendant submits that good cause exists for this extension request because the attorney
2 tasked with writing the response has several successive deadlines through December and
3 January, many of which have already been extended, and needs sufficient time to review the
4 record, evaluate the issues raised in Plaintiff's opening brief, and prepare Defendant's response.
5 In addition, the undersigned attorney has scheduled leave spanning the end of December and
6 beginning of January. Defendant's counsel will endeavor to complete these tasks as soon as
7 possible. This request is made in good faith and with no intention to unduly delay the
8 proceedings, and counsel apologizes for any inconvenience. Accordingly, Defendant requests an
9 extension in which to respond to file the response until January 26, 2024.

10 The undersigned conferred with Plaintiff's counsel, who confirmed on November 30,
12 2023, that Plaintiff has no objection to the requested extension.

13 It is therefore respectfully requested that Defendant be granted an extension of time to
14 file the response to Plaintiff's motion to remand, through and including January 26, 2024.

15 DATED November 30, 2023

16 Respectfully submitted,

17 JASON M. FRIERSON
18 United States Attorney

19 By: s/ Michonne L. Omo
20 MICHONNE L. OMO
21 Special Assistant United States Attorney
22 Office of Program Litigation, Office 7

23
24 Attorneys for Defendant
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 12/1/2023